

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

Myron Simmons

Moesha Flowers

Plaintiff(s)

V

Civil Compliant Case #

13C50044

Amanda Plucker, Rockford School District 205,

Mr.Scarfe, Mr. Vanderheyden, Mrs.Labunski,

Office Spriggs, Justin Gamhart,

Guildford Gym Teachers

Defendant(s)

Judge Reinhard

Civil Compliant

Plaintiff(s)

Myron Simmons

351 Underwood Street

Rockford, IL. 61101

Moesha Flowers

351 Underwood Street

Rockford, IL. 61101

Defendant(s)

Amanda Plucker

Machesney Park, IL

5620 Spring Creek Rd.

Rockford, IL. 61114

Justin Gamhart,

5620 Spring Creek Rd.

Rockford, IL. 61114

Rockford School District #205

501 7th street

Rockford, IL. 61104

RECEIVED

FEB 11 2013

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

Steve Scarfe
5620 Spring Creek Rd.
Rockford, IL. 61114

Russell Vanderheyden
949 Britannia Way
Rockford, IL.61108

Pamela Labunski
624 Paris ave.
Rockford, IL. 61107

Sara C. Nielson
5620 Spring Creek Rd.
Rockford, IL. 61114

Office Spriggs
Rockford, Illinois Police Department
Rockford, IL. 61101

Guildford Gym Teachers
5620 Spring Creek Rd.
Rockford, IL. 61114

This Complaint has been brought to life by the Defendant(s) and their words, as well as their action/ NONE ACTION that was taken on behalf of the Plaintiff(s). These claims of Violation of the Plaintiff (s) rights are as followed:

US Constitution, and Illinois Constitution, NO Child Left Behind law, civil rights laws, Fourteenth Amendment, Third Ku Klux Klan Act (1871), Civil Rights Act of 1875, etc. Violation that is protected by the Constitution of America and Illinois Constitution, Civil Rights Laws.

Claim:

Civil Rights, Due Process and Equal Protection, 14th & 15th Amendments, Inherent and Inalienable Rights, Defraud, Defamatory Communication, and Defamation Character, Due Process, Equal Protection, Inconsistence with the abuse of discretion standard, No Child Left Behind

These violations have been going on since West Middle School, Kennedy Middle School and now Guildford High School, all of District 205 Rockford, IL.

The Plaintiff(s) have been harassed, mistreated by the staff of District 205 Rockford, IL. Not only by one (1) staff member at all three (3) locations.

West Middle School:

Assistant Principal Rock-hold, have went to Plaintiff Flowers many times, with the report of another student compliant saying that Flowers was bullying them. Said student had no witness to those facts, Yet Mr. Rock-hold believed one student over another. On or about November 14, 2012 Mr. Rock-hold hit Plaintiff Flowers in the head with an ankle bracelet. This happen on one day when Plaintiff Flowers and a friend was passing Rock-hold in the hallway, Flowers said to Rock-hold here hold my dog and Flowers give him the chain/bracelet and keep walk at which time Flowers felted something hit her on the head, Flowers and said friend looked at one other and friend (said did he hit u) Flowers (I know he didn't just hit me). Plaintiff Flowers came home and told Plaintiff Simmons.

The very next day Plaintiff Simmons went to WEST Middle School, upon talking to Mr. Rock-hold he never denied hit Flowers, Rock-hold said that he was just playing with Flowers when he hit Flowers. AT WHICH time Simmons told

Rock-hold, Flowers don't come to school to be played with by any staff of 205 schools but to learn from district 205 staff/teacher. At which time Mr. Rock-hold asked Flowers to leave his, Simmons told Flowers not to because this was about Flowers. Mr. Rock-hold then got upset with the fact that Flowers was not leaving .and started to put us out of his office, which sent Simmons into defense mode. Simmons was force to show color or act in a way that was not good. Mr. Rock-hold followed us to the main office and called his boss, at which time Simmons was put out of West Middle School for reacting too Rock-hold action.

Do to Mr. Rock-hold action Simmons and his wife agree that Flowers was not safe at West Middle School at which time Flowers was transfer to Kennedy Middle School. When Flowers was transferring Ms. Rosa a staff members and was one of two teachers that was teachers in one of Flowers class at west changed Flowers grade. District 205 claimed to have done an investigation that Simmons couldn't found out the outcome of said investigation if there really was one.

One week after being transfer to Kennedy Mr. Rock-hold called over to Kennedy and informed Assistant Principal Cismesia that Flowers was a BULLY and Flowers was at West the day before bully on of his student. AP Cismesia approached Flowers with what was said to him from AP Rock-hold. From that day we had nothing but problems at Kennedy. Simmons joined Kennedy PTO, and Watch Dog Program.

While being a Watch Dog, Flowers had no problems with the staff at Kennedy it was always when Simmons was not at Kennedy that Cismesia confronted Flowers with a statement another student said FLOWERS was bullying her on Face book. Once Simmons show AP Cismesia, and Principal Louis that it was highly possible for Flowers to have been bullying anybody on Face book because she been on punishment since January 2011 and didn't know her password.

It was one thing or another with the staff at Kennedy, Ms. Eden was one Flowers math teacher, whom throw out one of Flowers worksheets that was she trying to turn in to her. Ms. Eden told Simmons, Flowers, AP Cismesia, and two other teachers that Eden throws Flowers paper away because Flowers didn't listen to Ms. Eden. And once again nothing was done about that. One day there was a fight on the Kennedy school bus stop that is right in front of Flowers and Simmons resident, after Simmons broke up the fight and kids was on their way to school Simmons called Kennedy to inform Principal Louis about the fight and advised Louis to ask Flowers what the girls name was whom was fighting. Instead of asking Flowers who was fighting Louis comforted Flowers about who she had problems and why was Flowers fighting.

School District 205 claims to want FATHER, UNCLE, BIG BROTHERS, GRANDDADDIES, STEP PARENTS, and OR ANY MALE FATHER FIUGER AT THE SCHOOL. NOT so cause when Simmons told another parent what Simmons show and heard Ms. Eden talking to his daughter. Said parent came to Kennedy and meet with Principal Louis, and after said meeting Mr. Louis called Simmons to his office and told Simmons that Simmons was no longer welcome in Kennedy as a Watch Dog. Two weeks after Mr. Louis kicked Simmons out of Kennedy the problems started up again. A student started picking with Flowers and when Flowers told AP Cismesia, and Principal Louis and nothing was done again. Once again the AP & P OF KENNEDY blamed Flowers for it wasn't until Simmons went to Kennedy and told Flowers in front of Louis to just start KICKING ASS AROUND KENNEDY. Flowers were told that if any girl comes up to her saying anything FUCK THEM UP and that when Flowers get finish FUCKING THEM UP CALL Simmons. .

And Now the Camel Back Is Broken

The stuff at Guilford High School 5620 Spring Creek rd. Rockford, IL.61114.Has repeatedly mistreated Plaintiff Flowers and Plaintiff Simmons from the being of the School Year.

On the third or fourth day of school, when Plaintiff Flowers got on the bus to go to school the school bus driver gave her a schedule. On Her return trip home, Plaintiff Flowers using said bus schedule to find her bus to go home. Said bus schedule had her name, school year, Grade Level, drop off time/place as well as pick up time/place, bus number. This informant was to help Plaintiff Flowers get home from school. Plaintiff Flowers asked Defendant Steve Scarfe, whom was out at the bus after school pick up. Can he help her find her bus, and he told Plaintiff Flowers, that he couldn't help her and it wasn't his problem. Because of his action or non-action Plaintiff Simmons had to find a ride to Guilford High School to pick up Plaintiff Flowers.

The next day Plaintiff Simmons went up to Guilford High School to address that problem, and to talk to Assistant Principal Russell Vanderheyden, about him believing another student when she said that Plaintiff Flowers was bullying her on their bus ride to and from school.

Defendant Russell Vanderheyden approached Plaintiff Flowers with false information, and told Plaintiff Flowers that he better not find out that she is bullying said student. While waiting on Defendant AP Vanderheyden, Plaintiff Flowers pointed out Mr. Lee the Attendance office staff, who asked Plaintiff Flowers for a Doctor Excuse because Plaintiff Simmons wrote a note saying that Plaintiff Flowers had a Doctor appointment.

Mr. Lee told Plaintiff Simmons that any student that is absence do to Doctor appointment must have note from Doctor, Mr. Lee Said it was a rule of School Board District 205, Mr. Lee attempted to show said rule to Plaintiff Simmons when he (Mr. Lee) toke out said rule book but Mr. Lee could not find said rule in said rule book.

By now I'm feeling like its 1960 and I'm enrolling my daughter in an all-white school. So the Plaintiff's left Mr. Lee's office and went to the Head Principal Ms. Janice Hawkins. Within three weeks Principal Hawkins had Plaintiff Flowers

and the other student in her office for a meeting between the two girls. (Problem solved) with students and move full force with the staff at Guilford.

The second week in October 2012, Plaintiff Flowers went to her Counselor Sara C. Nielson to file an incident report about another girl whom was bullying Plaintiff Flowers by bumping Plaintiff Flowers at passing time. Ms. Nielson told Plaintiff Flowers told it was nothing to report, it was just two girls whom didn't like one another.

Same day Plaintiff Flowers told Defendant Russell Vanderheyden that she needed to talk to him about two problems, she was haven't one(1) with Defendant Mrs. Labunski (Teacher), and how Mrs. Labunski be talking down to Plaintiff Flowers, making Plaintiff Flowers feel like a DUMMY, and two(2) a student.

Plaintiff Flowers said that it wasn't the student that made her feel unsafe, it's the way Plaintiff Flowers feels when it comes time to go to her eight (8) hour class, Defendant Russell Vanderheyden told Plaintiff Flowers that (he) Defendant Russell Vanderheyden didn't have time right then. So feeling like no help was at Guilford High School for Plaintiff Flowers told Plaintiff Simmons.

The third week of October 2012, Plaintiff Simmons started calling Guilford High School in attempt to talk with Defendant Russell Vanderheyden because Defendant Russell Vanderheyden told Plaintiff Simmons in a meeting that all the staff follow Rockford, IL School Dist. 205, AND the Illinois School Broad of Education.

The fourth week of October 2012, Plaintiff Simmons went to Guilford High School with hope of a meeting with Defendant Russell Vanderheyden, whom was in a meeting himself with Principal Janice Hawkins. Yet Plaintiff Simmons left message with front desk of student office, asking for Defendant Russell Vanderheyden to calling Plaintiff Simmons with an appointment with Defendant Russell Vanderheyden.

NO CALL NO SHOW Defendant Russell Vanderheyden was.

Which brings Defendant Mr.Scarfe in the suite the first week of November 2012, Plaintiff Flowers was at lunch when Flowers got Defendant Russell

Vanderheyden and Mr. Scarfe attach and told them about the girl because said student was now saying that she was going to kick Flowers ass.

The third week of November 2012, Plaintiff Simmons went to Guilford High School in attempt to talk to one of the AP's at Guilford, HOPEFULLY Defendant Russell Vanderheyden, yet none of the AP's was available for question. Do to Ms. Labunski calling Plaintiff Flowers a nigger, Plaintiff Simmons went to Mrs. Labunski classroom and made her feel like she made Plaintiff Flowers feel. (little, nothing, nigger, nigga, dumm). The staff at Guilford could have prevented all of what happen the day Simmons went to Guilford High school. Flowers and Simmons have complained to AP Vanderheyden for two months.

Mrs. Plucker told Ms. Hawkins that when Plaintiff Simmons would come to Guildford High school to visit with his daughter in her classrooms ,that I would get up close on her (Plucker). Plucker also said that on one of my visit her class was taking a test and Simmons was talking to some of the students as they were testing.

Its fun how none of this came out Ms Plucker mouth before I came up to Guildford and confronted Defendant Pamela Labunski about calling my child a nigger in front of the (8) eight hour class, Now Guildford staff are coming up with lies.

Defendant Justin Garnhart contend the statement of Defendant Plucker about Plaintiff Simmons invaded Plucker space and that one (1) time Garnhart came and place himself between Simmons & Plucker.

Office Spriggs on/about 1/07/2013 Defendant Spriggs refused to file or arrest a student at Guilford High School for stealing Plaintiff Flowers headset. Spriggs informed Simmons that Defendant Spriggs can and wasn't going to file a report or arrest on arrested. So what dist. 205 and the Rockford Police Department whom is represented by Officer Spriggs at the Guilford High School.

The Defendant(s) Gym Teacher at Guilford has repeatedly open lockers for the students that say they forgot there locker combination .They don't even check and see if that is the student locker that said Gym Teacher is about to open. That is Thief and conspiracy to commit thief

Guilford High School Staff use the discretion standard is Inconsistence when it comes to suspending a student, then the rest of the schools that are in the 205 school dist. For at Guilford students will be suspended for being trade

[REDACTED]

Remedy;

Mr. Myron Simmons-- 7.5 million dollars

Ms. Moesha Flowers --7.5 million dollars

Date: 1-31-13 2013

/s/ Myron Simmons

Myron Simmons
351 Underwood St.
Rockford, IL. 61101
815-968-5476

Date: 1/31/ 2013

/s/ Moesha Flowers

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